

SEP 30 1991

Federal Communications Commission
Office of the Secretary

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Commenters imply that we should not be treated equally because we don't go through comparative hearings. They don't mention that the criteria for weighting the low power lottery are based upon many of the same "merits" that are used in comparative hearings for full power stations. Nor do they mention that only a small percentage of stations granted in comparative hearings are today owned by the entity which originally got the license.

In its original Report and Order, the Commission wrote:

"...we do not intend to cater to full service licensees unreasonable fears of competition from low power stations, and fetter the low power service for that reason. We believe low power can provide competition that stimulates the entire telecommunications marketplace." It is this competition about which the Commission wrote, that now concerns the NAB and the INTV.

It is indeed a compliment to the low power television industry that the nation's two broadcasting giants have leveled their guns on it. Do they protest too loudly? We think they do. The fact that low power television is growing, while other broadcast services represented by these associations are not, is of understandable concern to them. However, the thinly veiled smokescreen of opposition they present fails to mention that just this month, the FCC placed an additional 703 Low Power Construction Permits on Public Notice, the largest number in history. This is evidence for the continued, pent up demand for local television service. Local service can be defined either as service to a community not otherwise served by a television station, as would be the case of a rural area, or it could be service to an unserved segment of an urban community, i.e., the Hispanic low power stations in Washington D.C.

The heavy hitters also seemed possessed with some convoluted argument that it is wrong to try to better oneself. What NAB or INTV member would attempt to devalue his investment, rather than enhance it. They write as if no one ever bought a 3,000 watt Class A FM radio station and then upgraded it, even to the extreme of changing the city of license if necessary, to increase its value. Only recently, Class A FM's were permitted to increase their power from 3kw

class, to enable local radio stations to increase their coverage area. Yet these same applicants knew the "bargain" they were getting when they applied for or bought their stations. In each of these cases, the Commission acted with the caveat that the stations must meet existing interference criteria, which is exactly what we are seeking. In many ways, the coverage needs of low power television stations, especially those in rural areas, are much more similar to local radio stations than to the mega-million watt full power television stations serving much larger areas. Local low power television stations are entitled to the same considerations as local radio stations in terms of their needs for additional power and coverage.

As to the call letter issue, in every other instance, the FCC has issued standard calls. Whether AM or FM, 3KW or 100,000 KW, daytime only, full time, 50,000 watt clear channel, UHF-TV or VHF-TV, the calls are all four letters, or six letters if the "FM" or "TV" designations are included. When the low power service was created, the FCC retained the translator call scheme in order to minimize the effects on its own resources. Circumstances have now presented themselves which clearly show a need for the Commission to change something which is now ten years old. As a station which has been on the air and operating for seven years, the single biggest element of confusion in our operation is our odd call letter designation. The argument that low power stations don't cover the entire marketplace and wouldn't show well in the ratings even if they had "regular" call signs

CERTIFICATE OF SERVICE

I, Lucy S. Colebaugh, do hereby certify that on September 30, 1991, I mailed copies of the foregoing Reply Comments of W43AG, Hopkinsville, Ky. by postage-paid, first-class United States mail, to the following:

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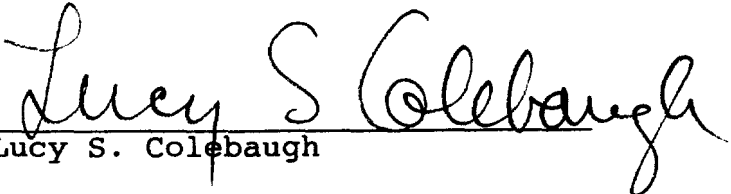
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